

**Sabatini Law Firm, LLC**

216 N. Blakely St.  
Dunmore, PA 18512

Statement as of: 11/25/2024

**Kristin Johannes**  
**1757 Beach Lake Highway**  
**Beach Lake, PA 18405**

Our file number: 3279-001

**Rate Summary**

<b>Professional</b>	<b>Gross</b>	<b>Discount</b>		<b>Net</b>
Shannon Dodge	0.60 hours at \$135.00/hr	\$81.00	0.60 hours	(\$81.00)
Brett Freeman	6.30 hours at \$310.00/hr	\$1,953.00	1.10 hours	(\$341.00)
Carlo Sabatini	7.90 hours at \$415.00/hr	\$3,278.50	4.96 hours	(\$2,056.50)
Ashley Werner	7.30 hours at \$150.00/hr	\$1,095.00	3.47 hours	(\$520.00)
Total:	22.10 hours (before discount)	\$6,407.50	10.12 hours	(\$2,998.50)
				\$3,409.00

**Itemized Listing of Services**

<i>Date</i>	<i>Description</i>	<i>Rate</i>	<i>Hours</i>	<i>Amount</i>	<i>Discount</i>
05/30/2020	Email to Midland requesting documentation concerning proof of claim filed.	CS 415.00	0.10	41.50	-41.50
05/30/2020	Email to Resurgent requesting documentation concerning proof of claim filed.	CS 415.00	0.10	41.50	-41.50
05/30/2020	Email to Jefferson Capital requesting documentation concerning proof of claim filed.	CS 415.00	0.10	41.50	0.00
06/01/2020	Receive, review, and respond to email from Jefferson Capital regarding which documentation I am looking for.	CS 415.00	0.10	41.50	-41.50
06/02/2020	Receive, review, and respond to email from MCM regarding amending proof of claim and whether we need additional information.	CS 415.00	0.10	41.50	-41.50
06/02/2020	Receive, review, and respond to email from Jefferson Capital regarding amended proof of claim and asking if I need anything further.	CS 415.00	0.10	41.50	0.00
06/03/2020	Receive, review, and respond to email from Jefferson Capital inquiring about why I need further documentation.	CS 415.00	0.20	83.00	-83.00
06/03/2020	Receive and review confirmation hearing memo regarding plan ready for confirmation.	CS 415.00	0.10	41.50	-41.50
06/04/2020	Receive and review order confirming chapter 13 plan.	CS 415.00	0.10	41.50	-41.50
06/09/2020	Receive, review, and respond to email from MCM attaching unredacted documentation for claim.	CS 415.00	0.10	41.50	-41.50
06/09/2020	Receive and review email from Midland Credit Management with attachment.	CS 415.00	0.10	41.50	-41.50

06/09/2020	Email to MCM regarding what the differences are with the secure website attachment and email attachment.	CS 415.00	0.10	41.50	-41.50
06/10/2020	Download Midland attachment again.	CS 415.00	0.10	41.50	-41.50
06/10/2020	Compare downloaded Midland attachment to the one from Midland's email. These are the same.	CS 415.00	0.10	41.50	-41.50
06/10/2020	Email to Midland regarding comparison.	CS 415.00	0.10	41.50	-41.50
06/10/2020	Email to MCM regarding responding to previous email concerning attachment differences.	CS 415.00	0.10	41.50	-41.50
06/10/2020	Receive and review email from MCM regarding website documents and email documents.	CS 415.00	0.10	41.50	-41.50
06/10/2020	Receive and review email from MCM regarding not providing further documentation concerning claim.	CS 415.00	0.10	41.50	-41.50
06/11/2020	Receive, review, and respond to email from MCM regarding no difference in the documents provided via email and website attachment.	CS 415.00	0.10	41.50	-41.50
06/15/2020	Analyze amended proof of claim 8.	ASW 150.00	0.20	30.00	-15.00
06/15/2020	Receive and review electronic notice of filing: Order Confirming Plan. Update file to reflect same.	ASW 150.00	0.10	15.00	0.00
06/23/2020	Receive and review email from client attaching mortgage statement and regarding payments to mortgage company not being applied correctly.	CS 415.00	0.20	83.00	0.00
06/23/2020	Email to client regarding payments to mortgage company.	CS 415.00	0.10	41.50	0.00
06/23/2020	Email to Hanyon regarding notice of error.	CS 415.00	0.10	41.50	0.00
06/24/2020	Receive and review email from Hanyon regarding not being allowed to accept notice of error.	CS 415.00	0.10	41.50	-41.50
06/25/2020	Receive and review email from client regarding mortgage payments made and escrow shortage.	CS 415.00	0.10	41.50	0.00
06/25/2020	Prepare notice of error.	CS 415.00	0.20	83.00	0.00
06/26/2020	Prepare exhibits for notice of error.	ASW 150.00	0.10	15.00	-10.00
07/13/2020	Review file regarding proof of claim inquiries. Email to CS regarding next steps concerning creditors not withdrawing claims filed on the docket.	ASW 150.00	0.20	30.00	-20.00
07/15/2020	Analyze amended claim 6. Email analysis to CS.	ASW 150.00	0.20	30.00	-15.00
07/15/2020	Receive and review analysis of amended claim 6.	CS 415.00	0.10	41.50	0.00
07/20/2020	Email to Resurgent requesting documentation on which claim 4 was based.	CS 415.00	0.10	41.50	-41.50
07/21/2020	Receive, review, and respond to email from Walters at Resurgent attaching documents supporting claim.	CS 415.00	0.10	41.50	-41.50
07/21/2020	Prepare certificate of service for 3001 motion against Jefferson Capital Systems.	ASW 150.00	0.10	15.00	0.00
07/21/2020	Prepare 3001 motion, letter, order, notice and exhibit. Time is estimated.	CS 415.00	0.80	332.00	0.00
07/22/2020	Email to ECF Event help regarding 3001 motion.	ASW 150.00	0.10	15.00	-15.00
07/22/2020	Receive and review email from Cindy Boyle permitting me to use generic motion to file 3001 motion against Jefferson Capital Systems.	ASW 150.00	0.10	15.00	-15.00

07/22/2020	File 3001 Motion and corresponding documents.	ASW	150.00	0.10	15.00	0.00
07/27/2020	Receive and review notice setting objection date and hearing filed on the docket.	CS	415.00	0.10	41.50	-41.50
07/31/2020	Receive and review email from Resurgent attaching affidavit regarding sale of account.	CS	415.00	0.10	41.50	-41.50
08/02/2020	Email to client with documents filed in his case and asking after a time to speak.	CS	415.00	0.10	41.50	-36.50
08/02/2020	Email to Resurgent with proposed protective order.	CS	415.00	0.10	41.50	-41.50
08/04/2020	Receive, review, and respond to email from client regarding a time to speak.	CS	415.00	0.10	41.50	-41.50
08/04/2020	Receive and review email from Resurgent regarding master sale and purchase agreement documents.	CS	415.00	0.10	41.50	-41.50
08/04/2020	Email to Resurgent regarding preclusion motion and objection to claim.	CS	415.00	0.50	207.50	-207.50
08/05/2020	Receive and review email from client regarding speaking after 4.	CS	415.00	0.10	41.50	-41.50
08/05/2020	Call to client. No answer, left message. Email to client regarding the same.	CS	415.00	0.10	41.50	0.00
08/05/2020	Receive, review, and respond to email from client regarding speaking before noon tomorrow.	CS	415.00	0.10	41.50	-41.50
08/06/2020	Receive, review, and respond to email from Resurgent regarding documents upon which claim 4 is based.	CS	415.00	0.10	41.50	-41.50
08/06/2020	Call with client. I'm going to treat all of the claims that I object to in his case as one project and the amount that I charge him for that project will not be more than I save him doing the project.	CS	415.00	0.30	124.50	-124.50
08/11/2020	Review and analyze amended proof of claim 4.	ASW	150.00	0.20	30.00	-30.00
08/18/2020	Email to client regarding plan payments.	CS	415.00	0.10	41.50	0.00
08/21/2020	Prepare second RFI to Quicken Loans.	ASW	150.00	0.10	15.00	0.00
08/24/2020	Call to clients to ask for mortgage statement. Stephanie said she would send that to me.	ASW	150.00	0.10	15.00	-10.00
08/26/2020	File notice of telephonic appearance on the docket.	ASW	150.00	0.10	15.00	-15.00
08/26/2020	Receive and review email from client with mortgage statement. Forward to CS.	ASW	150.00	0.10	15.00	-15.00
08/27/2020	Attend hearing on motion.	CS	415.00	0.20	83.00	0.00
08/27/2020	Receive and review order granting motion on Debtors Rule 3001(c)(3)(b) filed on the docket.	CS	415.00	0.10	41.50	0.00
10/05/2020	Prepare bill and fee application.	ASW	150.00	1.70	255.00	-255.00
10/06/2020	Review fee application. Call to client regarding the same. No answer, left message.	CS	415.00	0.10	41.50	-41.50
10/07/2020	Call to client regarding fee application. No answer, left message. Email to client regarding the same.	CS	415.00	0.10	41.50	-41.50
10/07/2020	Call to client regarding fee application. Email to client regarding the same.	CS	415.00	0.10	41.50	-41.50
10/08/2020	Re-date fee application for today and serve on certificate of service.com.	ASW	150.00	0.20	30.00	-30.00
10/08/2020	Receive, review, and respond to email from client approving fee application.	CS	415.00	0.10	41.50	-41.50

10/08/2020	File fee application.	ASW	150.00	0.20	30.00	-30.00
10/09/2020	Receive and review docket entry that fee application wasn't properly flattened. Refile fee application.	ASW	150.00	0.10	15.00	-15.00
10/24/2020	Email to client with Request for Notice filed on the docket.	CS	415.00	0.10	41.50	-36.50
10/25/2020	Receive and analyze notice of mortgage payment change filed on the docket.	ASW	150.00	0.20	30.00	-15.00
10/25/2020	Email to client with notice of mortgage payment change filed on the docket.	CS	415.00	0.10	41.50	-26.50
11/06/2020	Receive and review Amended Notice of Mortgage Payment Change.	ASW	150.00	0.10	15.00	0.00
11/06/2020	Receive and review Order granting fee application.	ASW	150.00	0.10	15.00	-15.00
11/06/2020	Email to client regarding new mortgage payment.	CS	415.00	0.10	41.50	-26.50
11/12/2020	Email to client with order approving fee app filed on the docket.	CS	415.00	0.10	41.50	-36.50
11/25/2020	Call to clients regarding mortgage. Partial payment, escrow, and arrears issue resolved. NAN.	CS	415.00	0.10	41.50	0.00
01/27/2021	Prepare interim case status report: Verify that (1) Trustee's schedule of distribution is in complete conformity with plan; (2) plan funding is sufficient but no greater than it needs to be; (3) tasks that need completion are scheduled to be completed.	ASW	150.00	0.40	60.00	0.00
02/16/2021	Review interim case status report prepared by paralegal.	CS	415.00	0.20	83.00	0.00
02/17/2021	Draft objection to claim.	BF	310.00	1.90	589.00	0.00
02/18/2021	Draft letter to Jefferson Capital.	BF	310.00	2.30	713.00	0.00
03/05/2021	Email to client with substitution of counsel filed on the docket.	CS	415.00	0.10	41.50	-36.50
03/16/2021	Receive and review email from MCM with documents for each of the 3 proofs of claim.	BF	310.00	0.60	186.00	-186.00
03/26/2021	Review file with SMD. Calendar future review. Set tickler for a month out.	BF	310.00	0.10	31.00	-31.00
03/26/2021	Review file. Need to do an Objection to Jefferson's response to proof of claim.	BF	310.00	0.10	31.00	-31.00
03/29/2021	Continue drafting objection to proof of claim.	BF	310.00	0.90	279.00	0.00
04/02/2021	Review file. Inform SMD that she needs to file and mail out objection.	BF	310.00	0.10	31.00	-31.00
04/05/2021	Finalize objection to proof of claim.	BF	310.00	0.10	31.00	0.00
04/05/2021	Letter to Jefferson Capital Systems enclosing a copy of Debtor's Objection to Proof of Claim 12, Proposed Order, and Notice.	SMD	135.00	0.10	13.50	-13.50
04/06/2021	Conference with SMD regarding filing the objection to the proof of claim for Jefferson Capital.	BF	310.00	0.20	62.00	-62.00
04/06/2021	File objection to proof of claim 12. (Had issues with filing.)	SMD	135.00	0.50	67.50	-67.50
04/13/2021	Email to client attaching objection to claim filed in his case.	CS	415.00	0.10	41.50	-36.50

05/12/2021	Receive and review order disallowing claim 12 filed on the docket. Review trustee13 to confirm claim won't be paid.	ASW	150.00	0.10	15.00	0.00
05/14/2021	Email to client regarding wage attachments and trustee letter.	CS	415.00	0.10	41.50	-41.50
06/08/2021	Email to client with order sustaining objection to claim.	CS	415.00	0.10	41.50	-36.50
10/18/2021	Receive and review notice of mortgage payment change. Analyze the same. Prepare email regarding payment amount.	ASW	150.00	0.20	30.00	0.00
10/31/2022	Receive and review notice of mortgage payment change filed on the docket. Review escrow analysis. The numbers are correct. Prepare email to client with notice of payment change.	ASW	150.00	0.20	30.00	0.00
11/03/2023	Receive and review notice of mortgage payment change. Analyze the same. Email to client with the same.	ASW	150.00	0.20	30.00	0.00
01/02/2024	Receive and review Entry of Appearance of Matthew K. Fissel filed on docket.	CS	415.00	0.10	41.50	-41.50
08/27/2024	Review file to confirm all things we want accomplished by plan have been accomplished and prepare summary for attorney. (Verify plan isn't underfunded, that all docket entries have been resolved, that client is on track to complete plan payments, any debts we want paid have been paid.)	ASW	150.00	0.30	45.00	0.00
09/16/2024	Review paralegal's summary of case and whether the same is on track to end how we expect it to.	CS	415.00	0.20	83.00	0.00
11/08/2024	Review notice of mortgage payment change. Email to client with new mortgage payment amount.	ASW	150.00	0.10	15.00	0.00
11/25/2024	Estimated paralegal time to close case. Review email from client approving fee application. File fee application online. [.2] Review order regarding fee application [.1] Review Trustee's website to confirm distribution is properly scheduled. [.1] Receive and review correspondence from Trustee's office indicating that client has completed plan payments. Draft letter to client regarding Certification in Support of Discharge. [.1] Draft Notice of Final Cure Payment. [.2] File Notice of Final Cure Payment. [.1] Receive and review executed Certification in Support of Discharge. File same electronically. [.1] Receive and review Response to Notice of Final Cure Payment. Send to client to verify accuracy of the same. [.1] Review discharge. [.1] Receive and review Clerk's Notice to Debtor indicating that unless an objection pursuant to F.R.B.P. 5009 is filed, case will be closed in 30 days. [.1] Review Final Decree. [.1] Closing email to client. [.1].	ASW	150.00	1.40	210.00	0.00

Sub-total Fees: 6,407.50 -2,998.50

Net Fees After Discount: **3,409.00**

### Expenses

<i>Date</i>	<i>Description</i>	<i>Price</i>	<i>Units</i>	<i>Amount</i>	<i>Discount</i>
06/26/2020	Postage for notice of error to Quicken Loans.	1.00	7.60	7.60	0.00
10/08/2020	Postage and cost for mailing of notice of fee application to creditor matrix.	1.00	20.90	20.90	0.00
	<i>Sub-total Expenses:</i>			28.50	0.00

### Payments

<i>Date</i>	<i>Description</i>	<i>Amount</i>
12/13/2020	Johannes Distribution from Trustee	5,654.57
	<i>Sub-total Payments:</i>	5,654.57

### Total

Net Fees After Discount:	3,409.00
Net Expenses After Discount:	28.50
<i>Total:</i>	<b>3,437.50</b>